

KRAMER LEVIN NAFTALIS & FRANKEL LLP  
Kenneth H. Eckstein  
David E. Blabey Jr.  
Rachael Ringer  
1177 Avenue of the Americas  
New York, NY 10036  
Telephone: (212) 715-9100

GILBERT LLP  
Scott D. Gilbert  
Craig Litherland  
Kami E. Quinn  
100 New York Ave, NW, Suite 700  
Washington, D.C. 20005  
Telephone: (202) 772-2200

BROWN RUDNICK LLP  
David J. Molton  
Steven D. Pohl  
7 Times Square  
New York, NY 10036  
Telephone: (212) 209-4800

OTTERBOURG P.C.  
Melanie L. Cyganowski  
Jennifer S. Feeney  
230 Park Avenue  
New York, NY 10169  
Telephone: (212) 661-9100

*Attorneys for the Ad Hoc Committee*

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

-----X  
In re: : Chapter 11  
: :  
PURDUE PHARMA L.P., *et al.*, : Case No. 19-23649 (RDD)  
: :  
Debtors. : (Jointly Administered)  
: :  
-----X

**VERIFIED STATEMENT PURSUANT TO BANKRUPTCY RULE 2019**

Pursuant to Rule 2019 of the Federal Rules of Bankruptcy Procedure (the “**Bankruptcy Rules**”), Kramer Levin Naftalis & Frankel LLP (“**Kramer Levin**”), Brown Rudnick LLP (“**Brown Rudnick**”), Gilbert LLP (“**Gilbert**”) and Otterbourg P.C. (“**Otterbourg**”) (together, “**Ad Hoc Committee Counsel**”), counsel to the Ad Hoc Committee (as defined herein), hereby submit this verified statement (“**Verified Statement**”) in the chapter 11 cases of the above-captioned debtors (collectively, the “**Debtors**” and the “**Bankruptcy Cases**”), and in support thereof state as follows:

1. The ad hoc committee of governmental and other contingent litigation claimants (collectively the “**Ad Hoc Committee**”) was initially formed on September 15, 2019 (as amended

from time-to-time), and retained Ad Hoc Committee Counsel<sup>1</sup> to represent the Ad Hoc Committee in connection with the Bankruptcy Cases. The Ad Hoc Committee currently consists of the parties-in-interest set forth on **Exhibit A** (each an “*Ad Hoc Committee Member*”). As disclosed on **Exhibit A**, each Ad Hoc Committee Member, a party-in-interest, holds claims and interests against the Debtors that may include, but are not necessarily limited to, unsecured claims, and administrative claims in unliquidated amounts. Members of the Ad Hoc Committee have filed complaints against the Debtors collectively asserting billions of dollars in damages. The members of the Ad Hoc Committee negotiated and support a settlement structure with the Debtors and their equity shareholders, on behalf of a larger group of supporting governmental and other contingent litigation claimants. Collectively, this larger group of creditors comprise over half the population of the country, holding substantial claims against the Debtors’ estates.

2. Nothing contained in this Verified Statement (or Exhibit A hereto) is intended to, nor should be construed to, constitute: (a) a waiver or release of any claims filed or to be filed against, or interests in, the Debtors held by any Ad Hoc Committee Member or any other entity, (b) a waiver of the sovereignty of any State or Indian tribe that may be a member of the Ad Hoc Committee, or (c) an admission with respect to any fact or legal theory. Nothing herein should be construed as a limitation upon, or waiver of, any rights of any Ad Hoc Committee Member to assert, file and/or amend any proof of claim in accordance with applicable law and any Orders entered in these Bankruptcy Cases.

---

<sup>1</sup> In addition to serving as co-counsel to the Ad Hoc Committee, each of the Ad Hoc Committee Counsel represents one or more creditors or parties-in-interest in the Bankruptcy Cases and adversary proceedings, including Ad Hoc Committee Members in such members’ independent capacities as creditors or parties-in-interest in the Chapter 11 Cases.

3. Other than as discussed herein, the Ad Hoc Committee Members and the Ad Hoc Committee do not purport to act, represent, or speak on behalf of any other entities in connection with the Bankruptcy Cases.

4. The undersigned declares under penalty of perjury that this Verified Statement is true and accurate to the best of his knowledge, information and belief.

5. Ad Hoc Committee Counsel reserve the right to amend or supplement this Verified Statement as necessary, in accordance with Bankruptcy Rule 2019.

Dated: October 10, 2019  
New York, New York

/s/ Kenneth H. Eckstein

Kenneth H. Eckstein  
Rachael Ringer  
KRAMER LEVIN NAFTALIS & FRANKEL LLP  
1177 Avenue of the Americas  
New York, New York 10036  
Telephone: 212-715-9100  
Facsimile: 212-715-8000  
Email: keckstein@kramerlevin.com  
rringer@kramerlevin.com

David J. Molton  
Steven D. Pohl (admitted *pro hac vice*)  
BROWN RUDNICK LLP  
7 Times Square  
New York, NY 10036  
Telephone: (212) 209-4800  
E-mail: dmolton@brownrudnick.com  
spohl@brownrudnick.com

Scott D. Gilbert (admitted *pro hac vice*)  
Craig Litherland (admitted *pro hac vice*)  
Kami E. Quinn (admitted *pro hac vice*)  
GILBERT LLP  
1100 New York Ave, NW, Suite 700  
Washington, DC 20005  
Telephone: (202) 772-2200  
E-mail: gilberts@gilbertlegal.com  
litherlandc@gilbertlegal.com  
quinnk@gilbertlegal.com

Melanie L. Cyganowski  
Jennifer S. Feeney  
OTTERBOURG P.C.  
230 Park Avenue  
New York, NY 10169  
Telephone: (212) 661-9100  
Facsimile: (212) 682-6104  
E-mail: mcyganowski@otterbourg.com  
jfeeney@otterbourg.com

*Counsel for the Ad Hoc Committee*

**EXHIBIT A**

**Disclosable Economic & Other Interests<sup>2</sup>**

<b>Ad Hoc Committee Member &amp; Address</b>	<b>Claim and/or Interest</b>
The State of Florida Attn: Ashley Moody, Attorney General PL-01 The Capitol Tallahassee, FL 32399	Unliquidated Claims
The State of Georgia Attn: Chris Carr, Attorney General Address: 40 Capitol Square, SW Atlanta, GA 30334	Unliquidated Claims
The State of Louisiana Attn: Jeff Landry, Attorney General 1885 North Third Street Baton Rouge, LA 70802	Unliquidated Claims
The State of Michigan Attn: Dana Nessel, Attorney General 525 W. Ottawa St. Lansing, MI 48909	Unliquidated Claims
The State of Mississippi Attn: Jim Hood, Attorney General Walter Stillers Building 550 High Street, Suite 1200 Jackson, MS 39201	Unliquidated Claims
The State of New Mexico Attn: Hector Balderas, Attorney General Villagra Building 408 Galisteo Street Santa Fe, NM 87501	Unliquidated Claims
The State of Ohio Attn: Dave Yost, Attorney General James A. Rhodes State Office Tower 30 East Broad Street, 14th Floor Columbus, OH 43215	Unliquidated Claims
The State of Tennessee Attn: Herbert H. Slatery III, Attorney General War Memorial Building 301 6th Avenue North Nashville, TN 37243	Unliquidated Claims
The State of Texas Attn: Ken Paxton, Attorney General 209 West 14th Street Austin, TX 78701	Unliquidated Claims

---

<sup>2</sup> To the best of Ad Hoc Committee Counsel's knowledge, the information herein is accurate as of the date hereof.

Ad Hoc Committee Member & Address	Claim and/or Interest
<p>The State of Utah Attn: Sean Reyes, Attorney General Utah State Capitol Complex 350 North State Street, Suite 230 Salt Lake City, UT 84114</p>	<p>Unliquidated Claims</p>
<p>Court appointed Co-Lead Counsel: Paul J. Hanly, Jr., Joseph F. Rice, and Paul T. Farrell, Jr., on behalf of the Court appointed Plaintiffs' Executive Committee in <i>In re National Prescription Opiate Litigation</i>, Case No. 17-md-02804, MDL No.2804 (the "PEC")</p> <p>Attn: Joseph Rice Address: MOTLEY RICE LLC 28 Bridgeside Blvd. Mt. Pleasant, SC 29464</p> <p>Attn: Paul Hanly Address: SIMMONS HANLY CONROY LLC 112 Madison Avenue New York, NY 10016</p>	<p><i>See Plaintiffs' Renewed Motion to Approve Co-Leads, Co-Liaison, and Executive Committee, In re: National Prescription Opiate Litigation</i>, Case No. 17-md-02804, MDL No. 2804, Jan. 4, 2018 (N.D. Ohio) (Dkt. No. 34); <i>see also</i> Margin Order Granting Dkt. No. 34 (Dkt. No. 37)</p>
<p>Broward County Attn: Danielle French and Andrew J. Meyers Address: 115 South Andrews Avenue, #423, Fort Lauderdale, FL 33301</p>	<p>Unliquidated Claims</p>
<p>City of Chicago Attn: Mark A. Flessner Address: 121 N. LaSalle Street, Suite 600 Chicago, Illinois 60602</p>	<p>Unliquidated Claims</p>
<p>Huntington/Cabell County Attn: Mike Woelfel Address: 801 8th Street, Huntington, WV 25701</p>	<p>Unliquidated Claims</p>
<p>King County Attn: Devon Shannon Address: 516 3<sup>rd</sup> Ave Seattle, Washington 98104</p>	<p>Unliquidated Claims</p>
<p>Muscogee (Creek) Nation Attn: Kevin W. Dellinger and Kyle B. Haskins Address: 1008 East Eufaula P.O. Box 580 Okmulgee, OK 74447</p>	<p>Unliquidated Claims</p>

Ad Hoc Committee Member & Address	Claim and/or Interest
<p>City of Philadelphia</p> <p>Attn: Pamela Elchert Thurmond Address: 1401 John F. Kennedy Blvd., 5<sup>th</sup> Floor Philadelphia, PA 19102-1595</p> <p>Attn: Benjamin Field Address: 1515 Arch Street, 15<sup>th</sup> Floor Philadelphia, PA 19102</p>	Unliquidated Claims
<p>Santa Clara County Office of the County Counsel County of Santa Clara Attn: Douglas Press Address: 70 West Hedding Street East Wing, 9<sup>th</sup> Floor San José, CA 95110</p>	Unliquidated Claims